

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 2/9/11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC
RECORDING CORPORATION; ARISTA
MUSIC, fka BMG MUSIC; CAPITOL
RECORDS, INC.; ELEKTRA
ENTERTAINMENT GROUP INC.;
INTERSCOPE RECORDS; LAFACE
RECORDS LLC; MOTOWN RECORD
COMPANY, L.P.; PRIORITY RECORDS LLC;
SONY MUSIC ENTERTAINMENT, fka SONY
BMG MUSIC ENTERTAINMENT; UMG
RECORDINGS, INC.; VIRGIN RECORDS
AMERICA, INC.; and WARNER BROS.
RECORDS INC.,

Plaintiffs,

v.

LIME GROUP LLC; LIME WIRE LLC; MARK
GORTON; GREG BILDSON; and M.J.G. LIME
WIRE FAMILY LIMITED PARTNERSHIP,

Defendants.

MEMO ENDORSED

ECF Case

06 CV 5936 (KMW)(DF)

**DEFENDANTS' NOTICE OF MOTION
AND MOTION TO FILE CONFIDENTIAL MATERIAL UNDER SEAL**

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Tel: (212) 728-8000

Attorneys for Defendants

Dated: January 24, 2011

NOTICE TO THE COURT, PLAINTIFFS AND THEIR COUNSEL OF
RECORD:

On January 6, 2011, the Court entered an Amended Stipulation and Protective Order (the "Amended Protective Order"), a copy of which is on file with the Court (ECF No. 400). Paragraph 15 of the Amended Protective Order requires a party submitting Confidential or Confidential-Attorneys' Eyes Only material to the Court to file such material under seal to protect it from disclosure.

Pursuant to the Amended Protective Order, Defendants Lime Group LLC, Lime Wire LLC, Mark Gorton, and M.J.G. Lime Wire Family Limited Partnership (collectively, "Defendants") hereby move this Court to place under seal, until further order of this Court, the following documents:

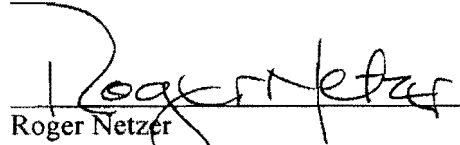
- Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Disqualify (unredacted, confidential version);
- Declaration of Todd G. Cosenza, executed January 24, 2011;
- Declaration of Jeffrey R. Farmer, executed January 24, 2011;
- Declaration of Jeffrey B. Korn, executed January 24, 2011;
- Declaration of Francis J. Menton, Jr., executed January 24, 2011.
- Declaration of Tariq Mundiya, executed January 24, 2011; and,
- Declaration of Roger Netzer, executed January 24, 2011 (unredacted, confidential version).

These documents have been designated by the parties as either Confidential or Confidential-Attorneys' Eyes Only under the Amended Protective Order. Accordingly, Defendants respectfully request that the above-listed documents be maintained under seal until further order of this Court.

Dated: January 24, 2011

Respectfully submitted,

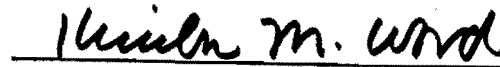
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SO ORDERED: 2-8-11



KIMBA M. WOOD
U. S. D. J.